UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

AMER SULIEMAN,

Plaintiff,

v. JEBARA IGBARA, JOUMANA DANOUN, AND MOTASHEM KHALIL

Defendants.

Case No.: 20-CV-6032

DECLARATION OF JEREMY M.
IANDOLO IN SUPPORT OF
PLAINTIFF, AMER SULIEMAN
MEMORANDUM OF LAW IN
SUPPORT OF THEIR OPPOSITION
TO DEFENDANTS MOTASHEM
KHALIL'S MOTION TO DISMISS

Jeremy M. Iandolo, an attorney for Defendant, states this under 28 U.S.C. § 1746:

- 1. The herein declaration is submitted in support of Plaintiff, Amer Sulieman, (Sulieman) opposition to Defendant Motashem Khalil's motion to dismiss.
- 2. Attached as **Exhibit 1** is a copy of is a copy of the Complaint and Affidavit in Support of Application for An Arrest Warrant.
- 3. Attached as **Exhibit 2** is a limited copy of the text message communications between Plaintiff and Defendant Khalil.
- 4. Attached as **Exhibit 3** is a copy the checks drafted by Defendant Khalil to Plaintiff, for repayment of the "loan," of which Defendant Khalil acknowledges in Exhibit 2.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge, information, and belief. Signed and dated on 14th of June, 2021, in Brooklyn, New York.

By: <u>s/ Jeremy M. Iandolo</u>